VIA ECF

November 26, 2024

Dated: November 27, 2024 Hon. Jennifer L. Rochon, U.S.D.J. United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Courtroom 20B New York, NY 10007-1312

The parties' request for an extension of time to make an application to reopen the case is GRANTED. The parties shall have the right to reopen the action until **December 26, 2024** if the settlement is not consummated.

New York, New York

SO ORDERED.

JENNIEER L. ROCHON **United States District Judge**

Re: Carriel et al v. Westfront Associates LLC et al. 1:22-CV-09426(JLR)

Dear Judge Rochon:

The parties in the above-referenced case, through their undersigned attorneys, write this joint letter requesting that the Court enter an order extending the time period set forth in your October 1, 2024 Order of Dismissal (Dkt. 57) by an additional 30 days.

As background, the parties notified the Court on September 30, 2024 that they had reached a settlement in principle as to all claims and would not be making summary judgment motions (Dkt. 56). On October 1, 2024, the Court entered an order dismissing this action, and setting a deadline of November 30, 2024 for the parties to make an application to reopen the case. The parties intend to submit a settlement agreement and for the Court to retain jurisdiction over this matter. Counsel for the parties have been diligently working to finalize all aspects of the contemplated settlement and are making steady progress but are waiting for approval from Defendants. Certain delay was caused, in part, because Plaintiffs are older individuals with disabilities and the settlement of this matter necessitates negotiating the terms on which they will temporarily relocate from their longterm home for disability-based modifications. Now Defendant's counsel is awaiting feedback on Plaintiffs' proposals from the Defendants. Given the upcoming Thanksgiving holiday, the parties are seeking an additional 30-day extension to ensure all the parties all have an opportunity to review the final agreement.

To the extent the Court declines to grant a further extension of time, Plaintiffs respectfully request that you treat this letter as their application to reopen this case.

Respectfully submitted,

Shanila Ali <u>/s/</u>

Shanila Ali Amanda O'Keefe Matthew Longobardi Mobilization for Justice, Inc. Attorneys for Plaintiffs

Jay B. Solomon

Jay B. Solomon Belkin Burden Goldman LLP Attorneys for Defendants